

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TROY ARDEN JULIAR, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SUNOPTA, INC., STEVEN BROMLEY,
JOHN H. DIETRICH, and STEPHEN R.
BRONFMAN,

Defendants.

CASE NUMBER: 08-CV-00933

JUDGE PAUL A. CROTTY

STEPHEN STRUGALA, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SUNOPTA, INC., STEVEN BROMLEY,
JOHN H. DIETRICH, and STEPHEN R.
BRONFMAN,

Defendants.

CASE NUMBER: 08-CV-01070

JUDGE PAUL A. CROTTY

RAY FOSTER, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SUNOPTA, INC., STEVEN BROMLEY,
JOHN H. DIETRICH.

Defendants.

CASE NUMBER: 08-CV-01313

JUDGE PAUL A. CROTTY

ROGER DAVIDSON, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SUNOPTA, INC., STEVEN BROMLEY,
JOHN H. DIETRICH,

Defendants.

CASE NUMBER: 08-CV-01496

JUDGE PAUL A. CROTTY

MARIE LORENZATO, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SUNOPTA, INC., STEVEN BROMLEY,
JOHN H. DIETRICH,

Defendants.

CASE NUMBER: 08-CV-01844

JUDGE PAUL A. CROTTY

ROBERT KNOX, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SUNOPTA, INC., STEVEN BROMLEY,
JOHN H. DIETRICH, and STEPHEN R.
BRONFMAN,

Defendants.

CASE NUMBER: 08-CV-02034

JUDGE PAUL A. CROTTY

ALBERT HALEGOUA, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SUNOPTA, INC., STEVEN BROMLEY,
JOHN H. DIETRICH, and STEPHEN R.
BRONFMAN,

Defendants.

CASE NUMBER: 08-CV-02910-UA

**MOTION OF THE SUNOPTA INVESTORS GROUP TO CONSOLIDATE RELATED
ACTIONS; TO BE APPOINTED LEAD PLAINTIFFS; AND TO APPROVE PROPOSED
LEAD PLAINTIFFS' CHOICE OF COUNSEL**

The SunOpta Investors Group (or “Movant”) respectfully move this Court for an order: (1) consolidating all related actions; (2) appointing Movant as Lead Plaintiff in this action pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); and (3) approving its selection of the law firm of Kahn Gauthier Swick, LLC, as Lead Counsel for the Class.

The SunOpta Investors Group makes this Motion on the belief that it is the most “adequate plaintiff” as defined in the PSLRA because:

1. its members have the largest financial interest in the relief sought by the Class and have incurred substantial losses in the amount of \$241,708.00 as a result of their purchases of SunOpta, Inc. stock during the Class Period, and
2. It satisfies the typicality and adequacy requirements of Fed. R. Civ. P. Rule 23.

The SunOpta Investors Group further requests that the Court approve the selection of its counsel, Kahn Gauthier Swick, LLC, (“KGS”), as Lead Counsel for the Class. This firm has actively investigated the allegations raised against Defendants. KGS is a nationally-recognized

law firm with significant class action, fraud, and complex litigation experience, and—as evidenced by the investigation KGS has undertaken as reflected in the first-filed complaint KGS prepared and filed on behalf of its client, is a firm with the resources to effectively and properly pursue this action.

WHEREFORE, for all of the reasons set forth herein and in the Memorandum of Law and the Miller Declaration submitted herewith, the SunOpta Investors Group respectfully request that this Court: (1) consolidate all related actions with the instant case; (2) appoint the SunOpta Investors Group as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the PSLRA; (3) approve the SunOpta Investors Group's selection of Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: March 28, 2008

Respectfully submitted,

KAHN GAUTHIER SWICK, LLC

/s/ Kim E. Miller

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KAHN GAUTHIER SWICK, LLC

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*Counsel for the SunOpta Investors Group
and Proposed Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that this Motion was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on March 28, 2008.

/s/ Kim E. Miller
Kim E. Miller

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Defendants.

CASE NUMBER: 08-CV-00933

JUDGE PAUL A. CROTTY

STEPHEN STRUGALA, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SUNOPTA, INC., STEVEN BROMLEY,
JOHN H. DIETRICH, and STEPHEN R.
BRONFMAN,

Defendants.

CASE NUMBER: 08-CV-01070

JUDGE PAUL A. CROTTY

RAY FOSTER, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SUNOPTA, INC., STEVEN BROMLEY,
JOHN H. DIETRICH.

Defendants.

CASE NUMBER: 08-CV-01313

JUDGE PAUL A. CROTTY

ROGER DAVIDSON, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SUNOPTA, INC., STEVEN BROMLEY,
JOHN H. DIETRICH,

Defendants.

CASE NUMBER: 08-CV-01496

JUDGE PAUL A. CROTTY

MARIE LORENZATO, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SUNOPTA, INC., STEVEN BROMLEY,
JOHN H. DIETRICH,

Defendants.

CASE NUMBER: 08-CV-01844

JUDGE PAUL A. CROTTY

ROBERT KNOX, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SUNOPTA, INC., STEVEN BROMLEY,
JOHN H. DIETRICH, and STEPHEN R.
BRONFMAN,

Defendants.

CASE NUMBER: 08-CV-02034

JUDGE PAUL A. CROTTY

ALBERT HALEGOUA, Individually And
On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

SUNOPTA, INC., STEVEN BROMLEY,
JOHN H. DIETRICH, and STEPHEN R.
BRONFMAN,

Defendants.

CASE NUMBER: 08-CV-02910-UA

**[PROPOSED] ORDER CONSOLIDATING RELATED ACTIONS; APPOINTING LEAD
PLAINTIFF; AND APPROVING PROPOSED LEAD PLAINTIFF’S CHOICE OF
COUNSEL**

Having considered the motion of the SunOpta Investor Group to consolidate all related cases, to be appointed Lead Plaintiff, and to approve proposed Lead Plaintiff's choice of counsel, and all papers in support thereof and in opposition thereto, and oral argument, if any, and good cause appearing therefor:

1. The Actions are hereby consolidated;
2. The SunOpta Investor Group is hereby appointed Lead Plaintiff for the Class pursuant to Section 21D of the Securities Exchange Act of 1934; and
3. The law firm of Kahn Gauthier Swick, LLC is hereby appointed Lead Counsel for Lead Plaintiffs and the Class.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE PAUL A. CROTTY
UNITED STATES DISTRICT JUDGE